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October 7, 2011

FILED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

Re: *Ex Parte* Notification
WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135;
WC Docket No. 05-337; CC Docket No. 96-45; CC Docket No. 01-92

Madam Secretary:

In accordance with Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, we hereby provide you with notice of an *ex parte* presentation made in connection with the above-captioned proceeding.

On Tuesday, October 4, Douglas Minster, Vice President, Government and Regulatory Affairs, Atlantic Tele-Network, Inc. ("ATNI"), and Brian Taylor, Chief Financial Officer, Allied Wireless Communications Corporation ("Allied Wireless"), met with Zachary Katz and James Schlichting to discuss the Commission's proposed universal service reforms on behalf of ATNI and its subsidiary Allied Wireless.

Messrs. Minster and Taylor discussed the need for a clear, well-reasoned and rational transition from current competitive eligible telecommunications carriers (CETC) high-cost funding to a new Mobility Fund in order to mitigate the likely negative effects on competitive wireless carriers and their customers. Mr. Taylor described Allied's current reliance on USF support and the need for certainty. Mr. Taylor also discussed proposals that would enable the assessment of current operations (decommissioning) and future expansion investment. He expressed concern that the potential withdrawal of high-cost support has already negatively-impacted established build-out plans and put at risk existing facilities constructed with high-cost support. He

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further expressed concern that Allied Wireless, which operates almost exclusively in remote areas that were divested following the merger of Verizon Wireless and Alltel, may be unable to sustain significant portions of its current service areas without continued support. Finally, he urged the Commission to ensure that any fund associated with mobile service be sufficient to include support for capital and operational expenses for existing and future operations, and to ensure continued and efficient provision of service to end-user customers.

Mr. Minster stressed the importance of establishing new universal service funding mechanisms that will be effective in making sufficient support available for the deployment and operation of mobile broadband infrastructure, including the maintenance of existing mobile network facilities. Mr. Minster also addressed the importance of sufficient universal service funding in the tribal and insular areas served by other ATNI companies.

If you have any questions or require any additional information, please contact undersigned counsel directly.

Respectfully submitted,

Todd B. Lantor

Robert S. Koppel

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cc: Zachary Katz
James Schlichting